



U.S. Department of Justice

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July 22, 2024

Via ECF

Hon. William J. Martini, U.S.D.J.
United States District Court
Martin Luther King Bldg. & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: *Pergament & Cepeda LLP v. SBA*, No. 23-cv-21632
Request for Extension of Administrative Termination

Dear Judge Waldor:

This Office represents defendant U.S. Small Business Administration (“SBA”) in the above-referenced declaratory judgment action seeking to prevent SBA’s acceleration of Plaintiffs’ COVID Economic Injury Disaster Loan. We write with the consent of Plaintiffs’ counsel to request a 30-day extension of the administrative termination period set forth in the Court’s May 23, 2024 order. ECF No. 16. The Court administratively terminated this action under Local Civil Rule 41.1(b) because the parties have reached a preliminary settlement subject to finalizing the terms of a settlement agreement.

Good cause exists to extend the administrative termination period because the parties continue to work diligently to finalize a settlement. The parties have exchanged drafts of a settlement agreement, and the individual Plaintiffs recently took steps to reorganize their law firm into a different corporate entity, which is one of the conditions to settlement.

If this proposal is acceptable to the Court, we respectfully request that Your Honor “so order” this letter and have the clerk file it on the docket. Thank you very much for your time and consideration of this matter.

Respectfully submitted,

PHILIP R. SELLINGER
United States Attorney

By: /s/ John F. Basiak Jr. _____
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cc: Avi Frisch (counsel for Plaintiffs)